



VISIBILITY IMPROVEMENT –
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Anna Garcia
Executive Director
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Hall of the States, 444 North Capitol St.
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Washington, DC 20001

RE: VISTAS Comments
MANE-VU Best and Final Modeling

Dear Anna,

The states involved in the VISTAS regional haze planning organization appreciate the opportunity to provide the following comments to the MANE-VU states regarding the recent MANE-VU Best and Final modeling effort which evaluated visibility benefits in 2018 of possible future emissions control strategies. The MANE-VU Best and Final strategy appears to include controls in the VISTAS region, and perhaps elsewhere, for which no enforceable requirements are in place to implement the projected controls. The modeling effort utilized information that is inconsistent with what was provided to MANE-VU during interstate consultation with the VISTAS states. MANE-VU used emission control strategies and levels for the VISTAS states that are different from those used in the VISTAS assessment and included in the State Implementation Plans (SIPs) by the VISTAS states.

For Electric Generating Units, VISTAS states began with the 2018 emissions controls projected by the Integrated Planning Model (IPM) version 2.1.9 and adjusted these projections to reflect known controls on specific units. VISTAS states consulted with their utilities to adjust IPM projections for 2018. This included additional controls on EGUs in Georgia and North Carolina for which state regulations are in place that require specific controls to be installed by 2018. It also included controls on EGUs in Alabama, Kentucky, Virginia, and West Virginia consistent with requirements of federal consent decrees. Florida, South Carolina, and Virginia added back into the inventory emissions from oil-fired boilers that IPM assumed would be shut down by 2018 but utilities indicated would not be shut down. In contrast, MANE-VU added SO₂ emissions back into the 2018 eastern RPO inventory because as modeled for VISTAS, total SO₂ emissions in the areas of the MRPO, MANE-VU and VISTAS were below the CAIR caps and MANE-VU states do not believe that that is realistic. VISTAS states are confident of controls that will be installed in the Southeast by 2009 and are relying on state regulations as well as utility and IPM projections for 2018.

These MANE-VU assumptions provide an alternative worst case estimate of 2018 emissions that does not use the specific evaluation completed by the VISTAS states and used in the VISTAS states' SIPs. VISTAS states have documented the basis for the assumptions

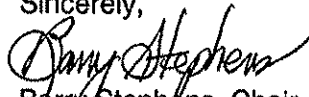
used in their SIPs and will re-evaluate progress in 2012 to determine if adjustments to these assumptions are needed.

MANE-VU states determined that reducing sulfur in fuel oil for residential, commercial, and industrial users and implementing BART controls could reduce SO₂ emissions from non-EGU sources in MANE-VU states by more than 28%. MANE-VU therefore asked VISTAS and MRPO to reduce SO₂ emissions from non-EGU by 28% and subsequently reduced the VISTAS and MRPO non-EGU 2018 SO₂ inventory by that percentage in the MANE-VU Best and Final modeling. Fuel oil contributes 15-37% to SO₂ in areas of influence for MANE-VU Class I areas, but in the VISTAS states, fuel oil contributions are less than 10% of the SO₂ emissions in the areas of influence for the VISTAS Class I areas. The VISTAS SO₂ contribution assessment for the VISTAS Class I areas demonstrated that the major sources of SO₂ in the VISTAS areas of influence are EGUs and coal-fired industrial boilers. To achieve a 28% reduction in non-EGU emissions in the VISTAS states, MANE-VU assumed that a 50-60% SO₂ reduction would be achieved for emissions from industrial boilers in the VISTAS states. These assumptions do not appear to take into account cost analyses conducted by VISTAS states as part of the evaluation of the four statutory factors for contributing sources in the areas of influence for VISTAS Class I areas. While most VISTAS states determined that there were no cost-effective controls for sources contributing to Class I areas in the VISTAS states, some VISTAS states are still completing their determinations. The ultimate collective conclusions of the VISTAS states will also apply for more distant Class I areas such as those in the MANE-VU region.

In summary, the MANE-VU Best and Final modeling has evaluated benefits of potential control strategies that do not reflect the emissions inventories provided to MANE-VU for the VISTAS states. Therefore the VISTAS states recommend that the MANE-VU states use the VISTAS inventories rather than the MANE-VU Best and Final inventory in their SIPs. States are given the authority to define reasonable measures for sources within their respective boundaries. Through the SIP approval process, EPA will determine if control assumptions included in VISTAS states' SIPs are appropriate to demonstrate reasonable progress toward visibility improvement. The VISTAS states believe that the MANE-VU state SIPs will be most readily approvable by EPA if the VISTAS inventories are used.

Thank you for your consideration. If you have questions, please direct them to John Hornback, executive director of SESARM, at 404-361-4000 or hornback@metro4-sesarm.org.

Sincerely,



Barry Stephens, Chair
VISTAS State and Tribal Air Directors

CC: John Hornback

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